

12 April 2010

Mr. Gennady Shteynberg  
Connecticut Department of Environmental Protection  
Bureau of Water Protection and Land Reuse  
Remediation Division  
79 Elm Street  
Hartford, CT 06106



&

Ms. Stephanie Carr  
RCRA Corrective Action Section  
U.S. Environmental Protection Agency – Region I  
5 Post Office Square – Suite 100  
Boston, MA 02109-3912

**Re:    *Updated Schedule & Response to DEP & EPA March 11, 2010 Letter  
      Former Framatome Facility  
      Lots 1 & 2, 80 Wampus Lane, Milford, Connecticut***

Dear Mr. Shteynberg and Ms. Carr:

On behalf of JMG Milford Realty, LLC (JMG), Environmental Resources Management (ERM) has prepared this letter in response to the 11 March 2010 conditional approval and associated comments jointly provided by the United States Environmental Protection Agency (EPA) and Connecticut Department of Environmental Protection (DEP) regarding the above referenced property (the Site) and the 5 January 2010 *Supplemental Investigation Work Plan* (the Work Plan). The Work Plan presented the proposed final investigation and monitoring scope of work required to achieve compliance with the RSRs for the Site, including Lot 1 and Lot 2.

***RESPONSE TO CT DEP & EPA COMMENTS DATED 11 MARCH 2010***

***1. Lot 1***

DEP and EPA approved the Scope of Work and Project Schedule for Lot 1, subject to one condition:

JMG is required to complete an *Ecological Receptor Exposure Pathway Scoping Checklist* as a means to document that ecological exposure pathways were considered as part of the

overall assessment of Lot 1. The Lot 1 schedule has been updated to accommodate this requirement and is attached to this letter.

## **2. Lot 2**

### Scope of Work

JMG understands that the scope of work proposed for Lot 2 is still under review, with feed back expected within a few weeks. JMG also understands that an *Ecological Receptor Exposure Pathway Scoping Checklist* will not be required for Lot 2 since an Ecological Risk Assessment is already planned, based on information generated at the Site previously.

### Schedule

JMG intends to perform the required scope of work for Lot 2 consistent with the original Schedule presented with the Work Plan. As a result, the Lot 2 scope of work would be initiated in 2012. An earlier start for Lot 2 would jeopardize JMG's ability to fulfill its obligations for both Lot 1 and Lot 2. The revised schedule, adjusted to reflect the added time for joint-agency approval of the scope of work for Lot 2, is attached hereto.

## **3. Groundwater Monitoring**

As requested by DEP and EPA, JMG will perform the required groundwater monitoring program as presented in the Work Plan, with the following added conditions:

- Groundwater elevation data will be collected and documented during all groundwater monitoring events; and
- If elevated concentrations of (PAHs) are detected in the soil within the Wood Block Area, these parameters will be added to the post-remediation monitoring program in select wells located downgradient from the Wood Block Area.

#### 4. Quality Assurance Project Plan (QAPP)

Updates to the 2006 QAPP are not necessary. The list of parameters for the Site has not changed, so Table 1 of the original 2006 QAPP, and the associated Analytical Methods will not change. Also, all groundwater monitoring will be performed in accordance with the revised low-flow sampling procedures presented in the document entitled "*Low Stress (low flow) Purging and Sampling Procedure for the Collection of Groundwater Samples from Monitoring Wells*" (EPA, July 30, 1996, revised January 19, 2010), as required.

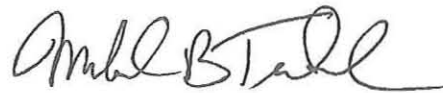
We trust these responses and the attached updated Schedule provide the information required. As requested, JMG will keep DEP and EPA informed on the progress of implementing the Work Plan for Lot 1.

Should you have any questions or require further clarification, please feel free to contact us at your convenience.

Very truly yours,



James L. Pfeifer, LEP  
Senior Project Manager



Michael B. Teetsel, CPG  
Principal

Proposed schedules for completion of the investigation and remediation of Lot 1 and Lot 2 are presented below:

<b>TASK #</b>	<b><u>LOT 1</u></b> <b>TASK DESCRIPTION</b>	<b>PROPOSED COMPLETION DATE</b>
1	Complete Synoptic round of groundwater monitoring at Site	Completed on August 5,6 & 7, 2009
2	Submit Draft Work Plan and Schedule for Investigation of Lot 1 and Lot 2 to EPA & CT DEP	Submitted on 1/ 5/2010
3	Receive comments on Scope of Work and Schedule from EPA and CT DEP	Received on 3/12/2010
4	Finalize Scope of Work for Lot 1	4/12/2010
5	Initiate supplemental Lot 1 Soil Investigation (AOC-2 & AOC-3)	5/3/2010
6	Finish supplemental Soil Investigation on Lot 1	5/14/2010
7	Complete spot soil remediation required to address TPH in WLD PE- 3 sample location, if required.	5/30/2010
8	Complete Ecological Receptor Exposure Pathway Checklist	5/30/2010
9	Install replacement GW monitoring wells, if required	5/30/2010
10	Initiate Groundwater Monitoring on Lot 1 (Year 1-Quarterly, Year 2-Semi-Annual)	7/15/2010
11	Finish Groundwater Monitoring on Lot 1	10/15/2011
12	Complete ELURs	11/15/2011
13	Issue Annual Reports	Every December
14	Issue Final Verification for Lot 1	2/15/2012

TASK #	<p style="text-align: center;"><u>LOT 2</u></p> <p style="text-align: center;">TASK DESCRIPTION</p>	PROPOSED COMPLETION DATE
1	Meet CT DEP and EPA on-site to confirm supplemental surface water, sediment and soil sample locations in Stubby Plain Brook & soil sample locations in Wood Block Area	2/2012
2	Finalize Lot 2 investigation Work Plan and QAPP and get approval from DEP and EPA.	2/15/2012
3	Initiate Investigation of Stubby Plain Brook, Associated wetland soils and Wood Block Disposal Area (AOC-1)	3/01/2012
4	Soil, Sediment and Surface Water Sample Results Due	3/15/2012
5	Complete SLERA	4/15/2012
6	Complete report on investigation of Wood Block Area and Stubby Plain Brook, including SLERA findings and recommendations for additional work/remedial requirements, if necessary.	5/15/2012
7	Develop Scope for additional investigation and/or remediation (RAP) & Submit to DEP & EPA for approval.	7/30/2012
8	Complete Milford Inland Wetlands Permit Application and presentation to Board (Initiate application process in May/June)	8/20/2012
9	Complete additional investigation and/or remediation activities described in RAP	9/30/2012
10	Complete final investigation Report for Lot 2	11/30/2012
11	Install any required replacement GW monitoring wells	2/1/2013
12	Initiate Groundwater Monitoring on Lot 2 (Year 1-Quarterly, Year 2-Semi-Annual)	3/1/2013
13	Finish Groundwater Monitoring on Lot 2	10/01/2014
14	Complete ELURs (if necessary)	11/15/2014
15	Issue Annual Reports	Every December
16	Issue Final Verification for Lot 2	February 2015